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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF CALIFORNIA**

1       **IT IS HEREBY STIPULATED** by and between Plaintiff, Dustin Neff (“Plaintiff”), and  
2 Defendant, Goode Enterprise Solutions Inc. (“GES”), by and through their respective counsel, that  
3 pursuant to Federal Rule of Civil Procedure 6(a), and Local Rule 6-1, GES may have to and  
4 including July 30, 2023, to file a responsive pleading in this matter, as GES is investigating the  
5 claims and is interested in engaging in settlement negotiations without the cost and expense of filing  
6 a responsive pleading. GES’ counsel is also in the process of applying to appear Pro Hac Vice in  
7 this matter. This does not alter the date of any event, or any deadline already scheduled by the  
8 Court, and this is the first extension provided by Plaintiff.

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10 Date: June 30<sup>th</sup>, 2023.

Respectfully submitted,

/s Valerie A. Yanaros, Esq.

Valerie Yanaros, Esq.

Texas Bar No. 24075628

Applying to Appear Pro Hac Vice in  
the Northern District Court of  
California

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**ATTORNEY FOR DEFENDANT GES**

/s Scott Alan Burroughs, Esq./

Scott Alan Burroughs, Esq.

Frank R. Trechsel, Esq.

DONIGER/BURROUGHS

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**ATTORNEYS FOR PLAINTIFF**

**ATTESTATION**

Concurrence in the filing of this document has been obtained from each of the individual(s) whose

electronic signature is attributed above.

By /s/ Valerie Yanaros

Valerie Yanaros

Attorney for Defendant,

Goode Enterprise Solutions, Inc.

**IT IS SO ORDERED**, Defendant, GES, shall have up to and including July 30, 2023, to file a responsive pleading.

DATE:

## United States District Court Judge

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2                   **CERTIFICATE OF SERVICE**  
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4     I hereby certify that on June 29, 2023, the foregoing document was filed with the clerk of  
5     the court for the U.S. District Court, Northern District of Texas, using the electronic case filing  
6     system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all  
7     attorneys of record who have consented in writing to accept this Notice as service of documents by  
8     electronic means, including:

9     Scott Alan Burroughs (SBN 235718)  
10    scott@donigerlawfirm.com  
11    Frank R. Trechsel (SBN 312199)  
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17    Attorneys for Plaintiff

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19                   /s/ Valerie Yanaros, Esq.  
20                   VALERIE YANAROS, ESQ.  
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